

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA

v.

APPROXIMATELY \$16,761 IN UNITED
STATES CURRENCY SEIZED FROM
JERMAINE LYDELL SANDERS ON
NOVEMBER 16, 2020, IN
MOORESVILLE, NORTH CAROLINA

CIVIL NO. 5:21-cv-00053

VERIFIED CLAIM OF JERMAINE LYDELL SANDERS

Claimant, Jermaine Lydell Sanders, hereby files this verified claim to the Sixteen Thousand Seven Hundred and Sixty-One Dollars (\$16,761.00) in United States currency that is the subject of this action. By this verified claim, Claimant shows the following:

1. Claimant is an individual residing at Waterbury, Connecticut (full address redacted pursuant to Section II(I)(1)(e) of the Administrative Procedures Governing Filing and Service By Electronic Means).
2. At all times relevant to Defendant's seizure, Claimant was the owner in whose possession the Defendant was in. The defendant funds were illegally seized from Claimant's vehicle, hence possession, in violation of Claimant's 4th Amendment and other constitutional rights, on November 15, 2020 by the Mooresville Police Department in the town of Mooresville, North Carolina.
3. The defendant funds: were made the subject of a state court *in rem* proceeding filed by Claimant on November 19, 2020; are within the Iredell County District Court of North Carolina's *in rem* jurisdiction; and remain so presently.

4. Per order of the above-stated North Carolina court, Defendant is entitled to return of the defendant currency, and hereby asserts the right to defend against the instant forfeiture action and to recover the defendant currency.

5. A copy of Claimant's complete administrative claim, which was timely filed with the U.S. Customs and Border Protection ("CBP") agency-the agency that adopted the seizure underlying the instant action-is attached hereto at Exhibit A. Presumably, the Plaintiff received Claimant's administrative claim as a part of the CBP's transfer of its file to Plaintiff for filing of the instant forfeiture action.

Verification. I, Jermaine Lydell Sanders, Claimant, under penalty of perjury under the laws of the United States of America, verify that the foregoing statements are true and correct to the best of my knowledge.

This the 5th day of April, 2021.

Jermaine Sanders
Jermaine Lydell Sanders